UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

FULTON COUNTY EMPLOYEES' RETIREMENT SYSTEM, Derivatively on Behalf of THE GOLDMAN SACHS GROUP, INC.,

Plaintiff,

v.

LLOYD BLANKFEIN, DAVID M. SOLOMON, M. MICHELE BURNS, MARK A. FLAHERTY, WILLIAM W. GEORGE, JAMES A. JOHNSON, ELLEN J. KULLMAN, LAKSHMI N. MITTAL, ADEBAYO O. OGUNLESI, PETER OPPENHEIMER, DAVID A. VINIAR, and MARK O. WINKELMAN,

Defendants,

and

THE GOLDMAN SACHS GROUP, INC.,

Nominal Defendant.

NOTICE OF CONSENT MOTION TO FILE SECOND AMENDED COMPLAINT

Case No.: 1:19-cv-1562-VSB

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Steven B. Singer, and the exhibits annexed thereto, Plaintiff Fulton County Employees' Retirement System ("Plaintiff"), by and through the undersigned counsel, will move this Court, before the Honorable Vernon S. Broderick, at the Thurgood Marshall United States Courthouse located at 40 Foley Square, New York, New York, on such day and at such time designated by the Court, for an Order granting Plaintiff leave to file Plaintiff's Verified Second Amended Shareholder Derivative Complaint, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure.

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Dated: November 13, 2020

Respectfully submitted,

SAXENA WHITE P.A.

/s/ Steven B. Singer

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Counsel for Plaintiff Fulton County Employees' Retirement System

CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2020, I caused to be filed a true and correct copy of the foregoing with the Clerk of Court via CM/ECF. Notice of this filing will be sent electronically to all registered parties by operation of the Court's electronic filing system.

/s/ Steven B. Singer Steven B. Singer